

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

IVETTE M. MARTINEZ GONZALEZ, ET  
AL.,

Plaintiffs,

v.

CIVIL No. 16–2077 (GAG-BJM)

CATHOLIC SCHOOLS OF THE AR-  
CHDIOCESES OF SAN JUAN PENSION  
PLAN, ET AL.,

Defendants.

**Joint Motion for Extension of Time to Conclude Meet-and-Confer Efforts**

To The Honorable Court:

The plaintiffs and Defendants Catholic Schools of the Archdioceses of San Juan Pension Plan and the Superintendence of Catholic Schools of the Archdioceses of San Juan respectfully request that this Court grant them three weeks—until September 21, 2017—to file (1) a joint informative motion regarding the outcome of their meet-and-confer efforts, or (2) their respective oppositions to the motion to compel and the motion to strike. This extension would allow the parties to exhaust their good-faith efforts to resolve all—or, at the very least, most—of their discovery disputes without this Court's intervention.

Thus, the appearing parties respectfully request that this Court grant this joint motion and give them until September 21, 2017 within which to either file a joint informative motion regarding the outcome of their meet-and-confer efforts or otherwise file their respective oppositions to the motions to compel and strike.

Dated: August 31, 2017

Respectfully submitted,

**SBGB LLC**

*Attorneys for Catholic Schools of the Archdioceses of San Juan Pension Plan and the Superintendence of Catholic Schools of the Archdioceses of San Juan*

Corporate Center Building | Suite 202  
33 Calle Resolución  
San Juan, PR 00920  
Tel. (787) 487-6006

/s/ JAIME L. SANABRIA MONTAÑEZ  
USDC-PR 225307  
[jsanabria@sbgbllaw.com](mailto:jsanabria@sbgbllaw.com)

**Carlos F. Lopez-Lopez**

PO Box 8852  
San Juan, PR 00910-0852  
787-273-0611

Fax: 787-501-4150

[charlielopez@gmail.com](mailto:charlielopez@gmail.com)

/s/ CARLOS F. LOPEZ-LOPEZ

USDC-PR 126514

*Attorneys for Plaintiffs*

**Mercado , Soto, Ronda, Amundaray &  
Pascual, PSC**  
PO Box 9023980

San Juan, PR 00902-3980

787-273-0611

Fax: 787-273-1540

[fjamundaray@aol.com](mailto:fjamundaray@aol.com)

/s/ **Francisco J. Amundaray-Rodriguez**

USDC-PR 208706

### **CERTIFICATE OF SERVICE**

I certify that, on this day, the foregoing was electronically filed with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

**By: /s/ Jaime L. Sanabria Montañez**